

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

LEONARD C. JEFFERSON,	}	
	}	
Plaintiff,	}	
	}	No. 1:04-cv-44
vs.	}	District Judge McLaughlin
	}	Magistrate Judge Baxter
WILLIAM WOLFE, et al.,	}	
	}	
Defendants.	}	

MOTION FOR SUMMARY JUDGMENT

AND NOW, come the defendants, by their attorneys, Tom Corbett, Attorney General, Christian D. Bareford, Deputy Attorney General, Susan J. Forney, Chief Deputy Attorney General, Chief Litigation Section, and respectfully submit the following Brief in Support of their Motion for Summary Judgment:

1. Defendants move for summary judgment based on the pleadings, depositions, answer to interrogatories, submissions, admissions on file, affidavits, or other declarations under penalty of law and other evidence which show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law.

2. The Defendants have herewith filed a Concise Statement of Material Facts Not in Dispute and an Appendix to Defendant's Motion for Summary Judgment containing the documents referenced in the Concise Statement of Material Facts Not in Dispute.

3. A Memorandum in Support of Defendant's Motion for Summary Judgment referencing these documents will also be filed herewith, providing reasons in support of the forgoing assertions with greater particularity; the contents of which are incorporated by reference.

CONCLUSION

WHEREFORE, it is respectfully requested this motion be granted.

Respectfully submitted,

Thomas W. Corbett, Jr.,
Attorney General

By: /s/ Christian D. Bareford
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Susan J. Forney
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Chief, Litigation Section

Date: January 12, 2007

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	}	
Defendants.	}	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **Motion for Summary Judgment** was electronically filed with the Court and served upon the following via first-class mail:

LEONARD JEFFERSON
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Albion, PA 16475-0001

/s/ Christian D. Bareford
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Date: January 12, 2007